

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

Haliron Power, LLC,

Plaintiff,

v.

Fluor Daniel Caribbean, Inc., a subsidiary  
of Fluor Enterprises, Inc.,

Defendant(s).

Civil Action No.: 6-18-cv-02911-TMC

**MOTION TO AMEND COMPLAINT**

**COMES NOW** the Plaintiff, Haliron Power, LLC (“Plaintiff”), by and through its undersigned attorneys, and hereby moves pursuant to the Consent Scheduling Order entered on November 6, 2018 and in accordance with Fed. R. Civ. P. 16(b)(3)(A), to amend its Complaint as reflected in the proposed Amended Complaint provided to the Court simultaneously with this filing.

This motion is necessitated by the facts that counsel for Fluor Daniel Caribbean, Inc., a subsidiary of Fluor Enterprises, Inc., Inc. (collectively “Fluor”) removed this matter from Greenville County, South Carolina Court of Common Pleas (Case No.: 2018-CP-23-04751) (the “State Court Suit”) to the United States District Court for the District of South Carolina, Greenville Division (Civil Action No.: 6-18-cv-02911-TMC) and since the filing of the State Court Suit, Fluor has provided Plaintiff with additional facts and information which requires Plaintiff to name additional parties and alter or amend its causes of action. Counsel for Plaintiff and Fluor have discussed and consulted on this Motion to Amend Complaint.

**WHEREFORE**, based on the foregoing, the Plaintiff hereby requests that the Court grant the Plaintiff’s Motion to Amend the Complaint and enter the Amended Complaint provided to the Court simultaneously with this filing.

Respectfully submitted,

s/Thomas E. Dudley, III

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Greenville, SC  
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